UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHELLE E. CROWE; :

MATTHEW T. HOOVER;

TYLER FRANKLIN; and : CA No. 2:11-cv-00689

MICHAEL RYAN JOHNSON,

: Judge William L. Standish

Plaintiffs,

.

v. : ELECTRONICALLY FILED

.

GLOBAL FITNESS HOLDINGS,

LLC,

.

Defendant. :

MOTION FOR ADMISSION OF ATTORNEY WILLIAM J. KISHMAN TO THE BAR OF THIS COURT PRO HAC VICE

Defendant, Global Fitness Holdings, LLC ("GFH"), through their undersigned counsel, hereby moves for an Order admitting William J. Kishman to appear and practice *pro hac vice* in this case. In support of its Motion, GFH states as follows:

- 1. As set forth in his Certification, attached as Exhibit A, Mr. Kishman is an attorney with the law firm of Greenebaum Doll & McDonald, PLLC, whose offices are located at 101 South Fifth Street, 3500 National City Tower, Louisville, Kentucky 40202.
- 2. Mr. Kishman is a member in good standing of the bar of the Commonwealth of Kentucky. He is admitted to practice before the Kentucky Supreme Court and the U.S. District Courts for the Western and Eastern Districts of Kentucky. There are no pending disciplinary proceedings against Mr. Kishman in any state or federal court.
- 3. The undersigned counsel, Erin J. McLaughlin, of the law firm of Buchanan Ingersoll & Rooney P.C., is qualified to practice in this Court and makes this Motion.

- 4. GFH has requested that Mr. Kishman represent it in this litigation.
- 5. Mr. Kishman is willing to submit to the jurisdiction of the Court and comply with all of its rules and procedures.
- 6. Mr. Kishman is familiar with the facts and circumstances of this action, and the local rules of this Court.
- 7. Mr. Kishman is a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
 - 8. The required fee is being submitted with this motion.

WHEREFORE, Defendant GFH respectfully requests the *pro hac vice* admission of attorney William J. Kishman to this Court for this action.

Dated: July 8, 2011 Respectfully submitted,

/s/ Erin J. McLaughlin

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